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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 SAMUEL ACEVEDO,

9 Plaintiff,

10 v.

11 EQUIFAX INFORMATION SERVICES, LLC;
12 EXPERIAN INFORMATION SOLUTIONS,
13 INC.; CLARITY SERVICES, INC.; FIRST
14 SAVINGS BANK; NEW YORK STATE
CHILD SUPPORT SERVICES; WEBBANK;
and CITIBANK, N.A.,

15 Defendants.

Case No.: 2:24-CV-01132-JCM-NJK

**UNOPPOSED MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT**

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17 Defendant identified as WebBank, by and through its undersigned counsel, and reserving
18 its right to assert any and all rights and/or defenses to this action, hereby files this Unopposed
19 Motion for Extension of Time to Respond to Complaint, and in support states as follows:

20 1. On June 20, 2024, Plaintiff filed the Complaint [ECF No. 1]. WebBank was served
21 with Plaintiff's Complaint on June 24, 2024. As such, WebBank's current deadline to respond to
22 the Complaint is July 15, 2024.

23 2. As soon as WebBank became aware of the Complaint, it endeavored to retain
24 counsel for the defense of this matter. The undersigned counsel was retained earlier this week.

25 3. WebBank has undertaken (and continues to undertake) a good faith investigation
26 into Plaintiff's allegations. WebBank respectfully requests an extension of time to respond to the
27 Complaint so that it (and/or newly retained counsel) may complete its investigation and prepare
28 an appropriate response, as well as confer with Plaintiff's counsel regarding potential resolution.

1 4. Counsel for WebBank has contacted counsel for Plaintiff regarding the requested
2 extension, and counsel for Plaintiff has consented to the same. As such, no party will be prejudiced
3 by this Court granting the relief sought in this Motion.

4 5. This is the first request for an extension of time for WebBank to file its responsive
5 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
6 any other party.

7 6. This Motion is filed in good faith and not for purposes of delay.

8
9 WHEREFORE, WebBank respectfully requests that this Court enter an Order granting its
10 Unopposed Motion for Extension of Time to Respond to Complaint and providing WebBank a 30-
11 day extension, through and including August 14, 2024, to respond to the Complaint.

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13
14 DATED this 10th day of July, 2024.

15 FREEDOM LAW FIRM, LLC

16 /s/ Gerardo Avalos

17 _____
18 Gerardo Avalos, Esq., NV Bar #15171
19 8985 S. Eastern Ave., Suite 100
Las Vegas, Nevada 89123
Attorneys for Plaintiff Samuel Acevedo

 WRIGHT, FINLAY & ZAK, LLP

 /s/ Ramir M. Hernandez

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Attorneys for Defendant WebBank

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24 IT IS SO ORDERED:

25
26 _____
27 United States Magistrate Judge

28 DATED: July 11, 2024